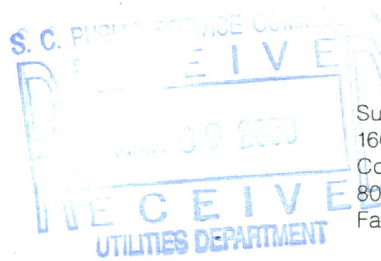


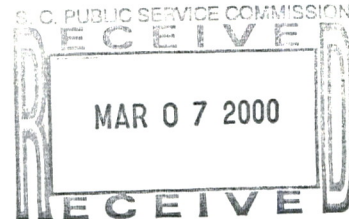
Caroline N. Watson  
General Counsel-South Carolina



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March 7, 2000

The Honorable Gary E. Walsh  
Executive Director  
Public Service Commission of SC  
Post Office Drawer 11649  
Columbia, South Carolina 29211



Re: Review of Proposed Guidelines for Prices Set by  
BellSouth Telecommunications, Inc. Pursuant to  
Section 576 of the South Carolina Code of Laws  
Docket No. 1999-469-C

Dear Mr. Walsh:

Enclosed please find for filing an original and twenty-five copies of the Rebuttal Testimony of Alphonso J. Varner filed on behalf of BellSouth Telecommunications, Inc. in the above-referenced matter. Also, please find enclosed an original and ten copies of BellSouth Telecommunications, Inc.'s Motion to Strike the prefiled testimony of Gregory J. Tate.

By copy of this letter, BellSouth is serving a copy of these documents upon all parties of record as reflected on the attached Certificate of Service.

Sincerely,

*Caroline Watson*

Caroline N. Watson

*by Robert C. [unclear]*

CNW/nml

Enclosure

cc: All Parties of Record

**ACCEPTED**  
Legal 203 3-8-00

**POSTED**  
DW 3-8-00

S.C. PUBLIC SERVICE COMMISSION  
**RECEIVED**  
MAR 07 2000

S.C. PUBLIC SERVICE COMMISSION  
**RECEIVED**  
MAR 09 2000  
UTILITIES DEPARTMENT

BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

DOCKET NO. 1999-469-C

In RE: )  
 )  
Review of Proposed )  
Guidelines for Rates )  
Set by BellSouth )  
Telecommunications, Inc. )  
Pursuant to )  
S.C. Code Ann. § 58-9-576 )  
\_\_\_\_\_ )

**MOTION TO STRIKE**

PLEASE TAKE NOTICE that the BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to 26 S.C.Code Ann.Reg. 103-840 (1976) and other applicable rules and regulations of the Public Service Commission of South Carolina ("Commission"), hereby moves for an Order of the Commission striking the testimony of Gregory J. Tate, pre-filed by AT&T Communications of the Southern States, Inc. ("AT&T"). In support of this motion, BellSouth would respectfully show the following:

1. On July 14, 1999, BellSouth notified this Commission of its intent to operate under an alternative form of regulation pursuant to S.C. Code Ann. § 58-9-576 (Supp. 1999). The election was effective on August 13, 1999. On November 12, 1999, BellSouth filed proposed guidelines in accordance with S. C. Code Ann. § 58-9-576(B)(5).

2. In accordance with S.C. Code Ann. § 58-9-576(B)(5), the Commission established this docket to review BellSouth's proposed guidelines. Numerous parties, including AT&T, intervened in this docket, and several intervenors pre-filed testimony commenting on BellSouth's proposed guidelines and the proper interpretation of S.C. Code Ann. § 58-9-576.

3. On February 29, 2000, AT&T pre-filed the testimony of Gregory J. Tate. Mr. Tate's testimony does not address BellSouth's proposed guidelines or S.C. Code Ann. § 58-9-576. Instead, Mr. Tate's testimony is devoted entirely to a discussion of BellSouth's switched access service rates. The stated purpose of Mr. Tate's testimony "is to show that BellSouth is charging rates for switched access services that are (10) times greater than the amount it charges for the same functionality for Unbundled Network Elements." (Tate Testimony, p. 3, ll. 19-23).

4. Accordingly, BellSouth moves to strike Mr. Tate's testimony on the grounds that it is irrelevant, immaterial, and beyond the scope of this docket. As stated above, this docket was created to review proposed guidelines to be adopted by this Commission in accordance with S.C. Code Ann. § 58-9-576(B)(5). The stated purpose of Mr. Tate's testimony is to address switched access rates, and does not even mention the word "guidelines" or refer to the relevant statute, S. C. Code Ann. § 58-9-576.

WHEREFORE, for the reasons stated above, it is respectfully submitted that the pre-filed testimony of Gregory J. Tate should be stricken in its entirety from this docket.

Respectfully submitted,

*Caroline Watson*  
*by Robert L. Ligon*  
*w/permission*

---

Caroline N. Watson  
BellSouth Telecommunications, Inc.  
Suite 821 - 1600 Hampton Street  
Columbia, South Carolina 29201  
(803) 748-8700

March 7, 2000

STATE OF SOUTH CAROLINA                    )  
  )     CERTIFICATE OF SERVICE  
COUNTY OF RICHLAND                        )

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused the Motion to Strike to be served by placing such in the care and custody of the United States Postal Service with first-class postage affixed thereto and addressed to the following this March 7, 2000:

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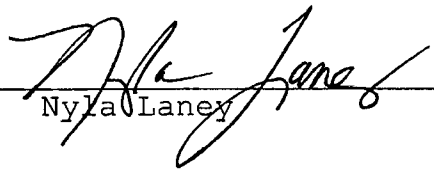
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 \_\_\_\_\_  
 Nyla Laney